



*Local Telephone Services - Internet & Broadband - Long Distance
Security & Alarms - Data Center Services*

February 6, 2006

**BY ELECTRONIC COMMENT
FILING SYSTEM (ECSF)**

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch:

Re: EB Docket No. 06-36 -
EB-06-TC-060 -
Certification of CPNI Filing February 6, 2006

Pursuant to Public Notice DA 06-223, dated January 30, 2006, and Public Notice DA 06-258, dated February 2, 2006, on behalf of Whidbey Telephone Company ("Company") enclosed herewith for filing with the Federal Communications Commission ("Commission") is the Company's report described in those two Public Notices. The report consists of a cover sheet and a copy of the Company's most recent compliance certificate and accompanying statement pursuant to Section 64.2009(e) of the Commission's rules and regulations.

Respectfully submitted,


Julia H. DeMartini
Vice President

Enclosure

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Federal Communications Commission
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cc: (by e-mail only, with enclosures)

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FEDERAL COMMUNICATIONS COMMISSION

EB DOCKET NO. 06-36

EB-06-TC-060

CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006

WHIDBEY TELEPHONE COMPANY

COMPLIANCE CERTIFICATE
PURSUANT TO SECTION 64.2009(e) OF THE
RULES AND REGULATIONS OF THE FEDERAL
COMMUNICATIONS COMMISSION, 47 C.F.R. § 64.2009(e)

I, Julia H. DeMartini, being of lawful age, state that I am Vice President of Whidbey Telephone Company, that I am authorized to execute this certificate as agent for Whidbey Telephone Company, and that the facts set forth in this certificate are true to the best of my knowledge, information and belief.

On that basis and in that capacity, I state that I have personal knowledge that Whidbey Telephone Company has established operating procedures that are adequate to ensure compliance by Whidbey Telephone Company with the rules and regulations of the Federal Communications Commission set forth in 47 C.F.R. §§ 64.2001 through 64.2009.

Dated: February 6, 2006.

WHIDBEY TELEPHONE COMPANY

By 
Julia H. DeMartini
Its: Vice President

STATEMENT, PURSUANT TO 47 C.F.R. § 64.2009(e), OF

WHIDBEY TELEPHONE COMPANY ("COMPANY"),

**ACCOMPANYING THE COMPANY'S COMPLIANCE CERTIFICATE,
DATED FEBRUARY 6, 2006, PURSUANT TO 47 C.F.R. § 64.2009(e)**

The Company has established policy that the Company, its employees and agents shall comply fully with all applicable Federal and state statutes, rules, regulations and orders pertaining to the use of, access to, and disclosure of Customer Proprietary Network Information ("CPNI"), as defined in Section 222 of the Communications Act of 1934, as amended, 47 U.S.C. § 222, and by Section 64.2003 of the rules and regulations of the Federal Communications Commission ("Commission"), 47 C.F.R. § 64.2003, as such definitions have been clarified by the Commission, and as defined in applicable state law and/or rules and regulations. The Company's policy (and/or operating procedures) may impose restrictions on the use of, access to, and/or disclosure of CPNI that are more stringent than those required by Federal or state law, rule, regulation or order. Violation of such policy (and/or operating procedures) by any employee of the Company is grounds for discipline, up to and including termination of employment.

The Company's operating procedures in furtherance of its above-mentioned policy include, but are not limited to, the following:

1. The Company does not engage in any outbound telemarketing.
2. Outbound print marketing, if any, that may be distributed by the Company by mail is addressed to all subscribers or customers within the applicable geographic area, zip code(s) and/or telephone number prefix(es), without regard to the specific services that the subscriber or customer receives, or does not receive, from the Company and/or the Company's affiliates. Such mailings, if they occur, do not use any CPNI and are addressed to the subscriber's or customer's billing name and billing address.¹
3. None of the Company's affiliates is permitted to use any CPNI of the Company for any outbound telemarketing or outbound print marketing.
4. The Company does not use any CPNI for any inbound marketing of services that are not within a category of service (*i.e.*, local, interexchange, and CMRS) to which the customer already subscribes from the Company and/or one or more of the Company's affiliates.

¹ A customer's billing name, billing address and telephone number are not included within the Commission's definition of CPNI. See *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customary Proprietary Network Information and Other Customer Information*, CC Docket No. 96-115, Order (DA 98-971), released May 21, 1998 (Chief, Common Carrier Bureau) at ¶¶ 8-9.

5. The Company does not sell, or provide access to any third party to, any of the Company's CPNI for purposes of marketing the services of the Company or of any of its affiliates, other than as permitted with respect to the Company's affiliates pursuant to 4. above.
6. Except for CPNI made available to other telecommunications carriers pursuant to tariffed or detariffed billing and collection arrangements and billing and collection services provided pursuant thereto, the Company does not sell CPNI to any third-party for any purpose.
7. The Company, its employees and agents may make such other uses and disclosures of, and permit access to, CPNI as are permitted by applicable statute, rule, regulation or order. Such uses, disclosures or access may include those authorized by Section 222 of the Communications Act of 1934, as amended, by Section 64.2005 of the Commission's rules and by orders of the Commission, such as those pertaining to the authorized exchange of data among telecommunications carriers and preferred carrier freezes.
8. Except as set forth above, the Company does not provide any CPNI to any governmental entity, or to any other third party, other than:
 - (i) pursuant to subpoena or other lawful process or with the subscriber's prior written consent, or
 - (ii) as a result of a person representing himself or herself to be the subscriber (or the subscriber's duly authorized agent) and having confirmed his or her identity or authority by providing to the Company appropriate identifying information (such as social security number, driver's license number, mother's maiden name, user name or password) or documentation, or otherwise being recognized by the Company as being the subscriber or the subscriber's duly authorized agent.
9. Company personnel are trained as to when they are and are not authorized to use CPNI.

WHIDBEY TELEPHONE COMPANY